

# **Exhibit “C”**

ORIGINAL

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4/6/09

ATTORNEY FOR PLAINTIFF

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

ROBERT SHEREZ;	)	Civil No. 04-00390 HG-KSC
	)	
Plaintiff,	)	PLAINTIFF'S FIRST REQUEST FOR
	)	PRODUCTION OF DOCUMENTS TO
vs.	)	DEFENDANT STATE OF HAWAII
	)	DEPARTMENT OF EDUCATION;
STATE OF HAWAII	)	CERTIFICATE OF SERVICE;
DEPARTMENT OF EDUCATION;	)	
PATRICIA HAMAMOTO,	)	
Superintendent of Hawaii	)	
Schools; MEREDITH MAEDA,	)	
Principal of Castle High	)	
School; SARA GRONNER or	)	
GRONNA, Vice Principal	)	
of Castle High School;	)	
	)	
Defendants.	)	

FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

The Plaintiff ROBERT SHEREZ, by and through his attorney, Andre S. Wooten, hereby requests the Defendant STATE OF HAWAII DEPARTMENT OF EDUCATION to produce for examination, inspection, and copying, all documents or items as follows.

INSTRUCTIONS

1. The term "documents" includes every writing or record of every type and description, however produced or reproduced, whether an original or otherwise, that is or has been in the

possession, control or custody of the party or of which the said party has knowledge, including without limitation:

- a. Correspondence, memoranda, telegrams, stenographic or handwritten or other notes, minutes, logs, journals, diaries;
- b. desk calendars, appointment books, time sheets;
- c. bills, statements, purchase orders, receipts, checks, money orders, tickets, ledgers;
- d. contracts, agreements;
- e. permits, licenses, and certificates;
- f. magnetic, electronic, video, and phono graphic recordings, computer disks and diskettes, and including information stored in the memories of computers, word processors, and magnetic typewriters;
- g. photographic records in any size or format, be it film, negatives, slides, prints, or other, whether still or "motion" pictures;
- h. drawings, pictures, graphs, maps, charts, surveys, diagrams, and sketches;
- i. books, magazines, pamphlets, studies; and
- j. other data, sources or compilation from which information can be obtained or translated, if necessary, by the respondent through detection devices into reasonably usable form.

"Documents" refers to items now in the possession or control

DOCUMENTS REQUESTED

1. All documents pertaining to the Plaintiff's employment with the Defendant, including files maintained by a Personnel Department or Human Resources Department.
2. All evaluations of the Plaintiff's job performance.
3. All disciplinary actions filed against the Plaintiff with regard to his employment.
4. An employee handbook or manual that the Defendant's employees are expected to abide by.
5. Any regulations that concern the hiring and promotion process of teachers, and specifically, of full-time special education teachers.
6. Any document that shows the names of tutors that were hired for the Honolulu and Windward Districts from August 2003 to the present.
7. Any document that shows the process or procedures by which these tutors were hired.

8. Any document that shows the names and hire dates of qualified special education teachers, full and part-time, that were hired from August 2003 to the present.
9. Any document that shows the special education teaching jobs this year.
10. Any document that shows the names of substitute teachers hired for special education or special services jobs, full and part-time, hired from August 2003 to the present.
11. Any document that shows the names of teachers qualified for full or part-time special education teaching jobs from August 2003 to the present.
12. Any document that shows the positions the Plaintiff has held.
13. All documents that mention the Plaintiff's name.
14. Any document that shows the names of any eligible teacher applicants who were hired for teaching positions of any kind for the Honolulu District from August 2003 to the present.
15. Any document that shows the names of any eligible teacher

applicants who were hired for teaching positions of any kind for the Windward District from August 2003 to the present.

16. Any document that shows the Defendant's rules and procedures for hiring part-time home and hospital tutors.
17. Any document that shows the Defendant's rules and procedures for hiring full-time special education teachers.
18. All of the Plaintiff's payroll sheets and any other documents that pertain to the Plaintiff's payroll.
19. Any document that you intend to present to a jury in this case.

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Defendants.

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CERTIFICATE OF SERVICE;

RE: PLAINTIFF'S FIRST REQUEST  
FOR PRODUCTION OF DOCUMENTS TO  
DEFENDANT STATE OF HAWAII  
DEPARTMENT OF EDUCATION

CERTIFICATE OF SERVICE

I certify that a copy of the PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT STATE OF HAWAII DEPARTMENT OF EDUCATION was duly served upon the following party(s) by hand-delivery on this date to their last known address:

Mark J. Bennett, Esq.  
Attorney General of Hawaii  
James E. Halvorson, Esq.  
Nelson Y. Nabeta, Esq.  
Deputy Attorneys General  
Department of the Attorney General  
235 South Beretania Street, 15<sup>th</sup> Floor  
Honolulu, HI 96813

DATED: Honolulu, Hawaii

*Andre S. Wooten*  
Andre S. Wooten  
Attorney for Plaintiff